

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re:

AARON TERRILL KEMP

\* Debtor

Case Number: 5-22-02400  
Chapter: 13

**CERTIFICATE OF MAILING**

The undersigned employee in the office of:

Tullio DeLuca, Esquire

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hereby certifies that a copy of the attached Notice and Motion to Suspend Trustee Payment was mailed today to all parties named on the mailing list attached hereto by regular first class mail.

DATED: May 24, 2023

SIGNED: Kayla Matthews

TITLE: /s/Legal Assistant

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

\*\*\*\*\*  
IN RE:  
AARON TERRILL KEMP : CHAPTER 13  
: CASE NO. 5-22-02400  
Debtor :  
\*\*\*\*\*  
AARON TERRILL KEMP :  
: MOVANT  
VS: :  
JACK N. ZAHAROPOULOS ESQ. : RESPONDENT  
\*\*\*\*\*

**MOTION TO SUSPEND TEMPORARILY TRUSTEE PAYMENTS**

AND NOW COMES, the Debtor, Aaron Terril Kemp, by and through his attorney,  
Tullio DeLuca, Esquire, and respectfully represents:

1. That the Debtor filed a Chapter 13 Petition on December 13, 2022
2. That Debtor's Chapter 13 Plan provides for monthly payments of \$961.00 to the Chapter 13 Trustee to pay attorney and Trustee fees and secured creditors.
3. Debtor has experienced a temporary loss of income due to unemployment..
4. Therefore, Debtor is not in a position to make the Trustee payments until his immediate problem stabilizes and regains income to satisfy the Chapter 13 Plan.
5. In light of the above, Debtor requests a Temporary Suspension of his Trustee payments for a period of three (3) months or earlier starting in the month of March 2023. If Debtor's immediate problem stabilizes, Debtor will commence Trustee payments sooner.

WHEREFORE, the Debtor respectfully requests that this Court enter an Order allowing for a suspension of Trustee's monthly payments for a period of at least three (3) months and directing the Debtor to commence making monthly payments sooner if Debtor's immediate problem stabilizes.

Respectfully submitted,

  
/s/Tullio DeLuca  
Tullio DeLuca, Esquire  
PA ID # 59887  
381 N. 9<sup>th</sup> Avenue  
Scranton, Pa 18504  
(570) 347-7764  
Attorney for Debtor

Dated: May 23, 2023

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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IN RE:  
AARON TERRILL KEMP : CHAPTER 13  
Debtors : CASE NO. 5-22-02400

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AARON TERRILL KEMP :  
  
MOVANTS :  
VS.  
JACK N. ZAHAROPOULOS ESQ. :  
RESPONDENT :  
\*\*\*\*\*

ORDER

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After notice and service to creditors and parties in interest under FRBP 9013  
and upon consideration of the Debtor's Motion to Suspend Temporarily Trustee Payments,  
it is hereby **ORDERED, ADJUDGED AND DECREED** by this Honorable Court that the  
Debtor's Motion to Suspend Temporarily Trustee Payments is granted and the Debtor is  
allowed to suspend payments to the Chapter 13 Trustee for a period of three (3) months  
from March 2023 to May 2023 due to loss of income and it is further ordered that if the  
Debtor return to gainful employment prior to the three (3) month period, Debtor, is ordered  
to commence making monthly payments to the Chapter 13 Trustee.

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

\*\*\*\*\*  
IN RE: : CHAPTER 13  
AARON TERRILL KEMP : CASE NO. 5-22-02400  
Debtor :  
\*\*\*\*\*

AARON TERRILL KEMP :  
MOVANTS :  
VS. :  
JACK N. ZAHAROPOULOS ESQ. :  
RESPONDENT :  
\*\*\*\*\*

**NOTICE TO CREDITORS AND OTHER PARTIES IN INTEREST**

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**NOTICE OF OPPORTUNITY TO OBJECT AND HEARING:** Pursuant to Local Rule 2002-1(a), the Court will consider this motion, objection, or other matter without further notice or hearing unless a party in interest files an objection/response on or before **June 14, 2023**. If you object to the relief requested, you must file your objection/response with the Clerk of Court and serve a copy on the movant and movant's attorney, if one is designated.

If you file and serve an objection/response within the time permitted, the Court may schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the Court will deem the motion unopposed and proceed to consider the motion without further notice or hearing, and may grant the relief requested.

Date: May 24, 2023

Clerk, U.S. Bankruptcy Court  
197 South Main Street  
Wilkes-Barre, PA 18701

Tullio DeLuca, Esquire  
PA ID# 59887  
Attorney for Debtors/Movants  
381 N. 9<sup>th</sup> Avenue  
Scranton, PA 18504

CKS Prime Investments, LLC  
1800 Route 34 N, Bldg 3  
Suite 305  
Wall, NJ 07719-9168

Capital One  
PO Box 30285  
Salt Lake City, UT 84130-0285

Capital One N.A.  
by American InfoSource as agent  
PO Box 71083  
Charlotte, NC 28272-1083

CONTINENTAL FINANCE COMPANY  
PO BOX 3220  
BUFFALO NY 14240-3220

Credit One Bank  
P.O. Box 98872  
Las Vegas, NV 89193-8872

First Premier Bank  
P.O. Box 5524  
Sioux Falls, SD 57117-5524

LVNV Funding, LLC  
c/o Resurgent Capital Svrc  
P.O. Box 10  
Greenville, SC 29602-0010

LVNV Funding, LLC c/o Resurgent Capital Serv  
PO Box 10587  
Greenville, SC 29603-0587

Mr. Cooper  
8950 Cypress Waters Blvd  
Dallas, TX 75019-4620

NATIONSTAR MORTGAGE LLC  
PO BOX 619096  
DALLAS TX 75261-9096

Premier Bankcard, LLC  
Jefferson Capital Systems LLC Assignee  
Po Box 7999  
Saint Cloud MN 56302-7999

Quantum3 Group LLC as agent for  
Galaxy International Purchasing LLC  
PO Box 788  
Kirkland, WA 98083-0788

US DEPARTMENT OF HOUSING & URBAN  
DEVELOPMENT  
ATTN OFFICE OF REGIONAL COUNSEL  
THE WANNAMAKER BUILDING  
100 PENN SQUARE EAST--11TH FLOOR  
PHILADELPHIA PA 19107-3325

United States Trustee  
228 Walnut Street, Suite 1190  
Harrisburg, PA 17101-1722

JACK N ZAHAROPOULOS  
ATTN CHAPTER 13 TRUSTEE  
8125 ADAMS DRIVE SUITE A  
HUMMELSTOWN PA 17036-8625